

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                            |   |                             |
|----------------------------|---|-----------------------------|
|                            | ) |                             |
| In re                      | ) | Chapter 7, No. 22-40924-EDK |
|                            | ) |                             |
| MAIN STREET MASSACHUSETTS, | ) |                             |
| LLC                        | ) |                             |
|                            | ) |                             |
| Debtor                     | ) |                             |
|                            | ) |                             |

**TRUSTEE'S RESPONSE TO NOTICE OF INACTIVITY**

Now comes JONATHAN R. GOLDSMITH, the duly appointed, qualified and acting Trustee in the above-captioned case, and hereby files this Response to the Court's Notice of Inactivity dated September 7, 2023.

1. That on December 29, 2022, the above-named Debtor filed a Voluntary Petition under the provisions of Chapter 7 of the Bankruptcy Code.

2. That on December 30, 2022, JONATHAN R. GOLDSMITH accepted the appointment as Chapter 7 Trustee for the above-entitled Bankruptcy Estate.

3. That on September 7, 2023, the Court filed a Notice of Inactivity on the Case.

4. The primary reason that this case remains open is that the Trustee is monitoring civil suits currently pending in other jurisdictions against Major League Baseball ("MLB") that have been commenced by minor league teams similar to the team owned by the Debtor. At least one of these cases is expected to go to trial in the next month. The outcome of the case will determine if the Trustee moves to commence a similar action against MLB.

JONATHAN R. GOLDSMITH, TRUSTEE IN  
BANKRUPTCY FOR MAIN STREET  
MASSACHUSETTS, LLC

Dated: 10/5/23

By: /s/ Jonathan R. Goldsmith, Esq.  
JONATHAN R. GOLDSMITH, ESQ.  
(BBO No. 548285)  
GOLDSMITH, KATZ & ARGENIO, P.C.  
1350 Main Street, Suite 1505  
Springfield, MA 01103  
Tel. (413) 747-0700

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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In re

MAIN STREET MASSACHUSETTS,  
LLC

Debtor

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)  
) Chapter 7, No. 22-40924-EDK  
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**CERTIFICATE OF SERVICE**

I, JONATHAN R. GOLDSMITH, ESQ., of GOLDSMITH, KATZ & ARGENIO, P.C.,  
1350 Main Street, Suite 1505, Springfield, Massachusetts, do hereby certify that I served a copy  
of the within Response upon the below-listed parties by electronic mail or by mailing, first class  
mail, postage prepaid, on this 5<sup>th</sup> day of October, 2023:

OFFICE OF THE U.S. TRUSTEE  
446 Main Street, 14<sup>th</sup> Floor  
Worcester, MA 01608

/s/ Jonathan R. Goldsmith, Esq.  
JONATHAN R. GOLDSMITH, ESQ.